1 2 3 4 5 6 7	SCOTT J. HYMAN (State Bar No. 148709) sjh@severson.com KALAMA M. LUI-KWAN (State Bar No. 242121) kml@severson.com ALISA A. GIVENTAL (State Bar No. 273551) aag@severson.com SEVERSON & WERSON A Professional Corporation One Embarcadero Center, Suite 2600 San Francisco, CA 94111 Telephone: (415) 398-3344 Facsimile: (415) 956-0439 Attorneys for Defendant		
8	WELLŠ FARGO BANK, N.A.		
9			
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	MOHAMMAD SUBHANI,	Case No.: 3:12-cv-01755-MEJ	
13 14	Plaintiff, vs.	STIPULATION TO CONTINUE DEFENDANT'S DEADLINE TO	
15	WELLS FARGO BANK, NATIONAL	RESPOND TO COMPLAINT	
16	ASSOCIATION an FDIC insured corporation and does 1 through 100, inclusive,	Complaint Date: March 8, 2012	
17	Defendant.	,	
18			
19	WHEREAS, on March 8, 2012, plaintiff Mohammad Subhani ("Plaintiff") filed an initial		
20	complaint ("Complaint") in the Superior Court	of the State of California, for the County of Contra	
21	Costa, Case No. C 12-00551 ("Action");		
22	WHEREAS, on March 8, 2012, Plaintiff served the Complaint upon defendant Wells Fargo		
23	Bank, N.A. ("Wells Fargo");		
24	WHEREAS, on April 9, 2012, Wells Fargo removed the Action to this Court;		
25	WHEREAS, under the Federal Rules of Civil Procedure, Wells Fargo's initial deadline to		
26	answer or otherwise respond to the Complaint was April 16, 2012;		
27			
28	07605 1120/2211615 1	1	
	07685.1120/2211615.1	Stipulation	

Stipulation Case No.: CV121755 MEJ

1	WHEREAS, Plaintiff agreed to extend the deadline for Wells Fargo to respond to the		
2	Complaint until April 30, 2012;		
3	3 WHEREAS, the parties engaged in settleme	WHEREAS, the parties engaged in settlement discussions;	
4	WHEREAS, Plaintiff agreed to extend the d	eadline for Wells Fargo to respond to the	
5	5 Complaint until May 14;	Complaint until May 14;	
6	6 WHEREAS, the parties have come very near	WHEREAS, the parties have come very near settlement;	
7	7 WHEREAS, Plaintiff agreed to extend the d	WHEREAS, Plaintiff agreed to extend the deadline for Wells Fargo to respond to the	
8	8 Complaint until June 1, 2012;		
9	9 WHEREAS, the parties agree that if settlem	WHEREAS, the parties agree that if settlement is not reached by June 1, the parties will	
10	not seek a further extension; and		
11	NOW THEREFORE, IT IS HEREBY STIPULATED by the parties hereto, through their		
12	respective counsel, that:		
13	1. The time for Wells Fargo to answer or otherwise respond to the Complaint shall be		
14	extended until and including June 1, 2012; and		
15	This stipulation is without prejudice	2. This stipulation is without prejudice to the rights, claims, arguments and defenses	
16	of all parties.		
17	17 DATED: May 10, 2012	AGARIA LAW, P.C.	
18	18 B	y: /s/ Elliott W. Gale	
19		Elliot W. Gale	
20		ttorneys for Plaintiff ohammad Subhani	
21	<b>21</b>	EVERSON & WERSON	
22	22	Professional Corporation	
23	23 B	y: /s/ Alisa A. Givental Alisa A. Givental	
24		ttorneys for Defendant	
25		ells Fargo Bank, N.A.	
26	26		
27	27		
28	<b>28</b> 07685.1120/2211615.1		
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Stipulation Case No.: CV121755 MEJ

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1	Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I a	ttest	
2	under penalty of perjury that concurrence in the filing of the document has been obtained from		
3	Elliott W. Gale.		
4	/s/ Alisa A. Givental Alisa A. Givental		
5	Alisa A. Givental		
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Stipulation Case No.: CV121755 MEJ

1	<del>[PROPOSED]</del> ORDER		
2	Pursuant to the stipulation of the parties and GOOD CAUSE APPEARING:		
3	IT IS HEREBY ORDERED that the time for Wells Fargo to answer or otherwise respond		
4	to the Complaint shall be extended until and including June 1, 2012.		
5	DATED: May 10, 2012		
6	CHIEF MAGIST, ATE JUDGE MARIA-ELENA JAMES		
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[Proposed] Order Case No.: CV121755 MEJ